

**DECLARATION OF S.W.**

Shenika Wilcox, pursuant to 28 U.S.C. § 1746, and subject to the penalties of perjury declares as follows:

1. My name is Shenika Wilcox. I am more than twenty-one years of age, competent to testify, and have no legal or mental disability and have personal knowledge of the facts stated herein. I freely give this declaration for use in this case. This declaration was executed in the state of Georgia, where I am a resident.
2. I grew up around the Fulton Industrial Boulevard area of Atlanta and was familiar with the Airway Motel located at 720 Fulton Industrial Boulevard NW, Atlanta, Georgia.
3. I was at the Airway Motel in 2015. While I was there, I saw approximately 10 to 15 girls walking around the property who were often dressed in lingerie or just bras and panties staying at the motel. Based on my observations, I believed some or all of these girls were being sold for sex to buyers who would visit the motel. I also saw about 10 to 15 “smokers,” people who were clearly smoking crack at the motel.
4. My belief was based on the fact that these girls would often walk in front of the motel or stand outside their rooms waiting for men to approach them, and then


the girls would take the men into their rooms for a short amount of time. I also observed men who I believed to be the girls' pimps who would often be hanging around the girls at the motel.

5. On July 11, 2015, I was at the Airway Motel with a friend when I was the victim of an assault that took place there in room number 32. A group of men wearing masks and all black clothing entered the motel room uninvited.
6. While the group of men were in the room, I saw at least one of them had a silver and black handgun. The unknown men instructed me that if I wanted to make money in the area, I would have to contact them. To me, "making money" meant prostituting or selling drugs. I told the men that I was not doing any of that.
7. After the group of men left the motel room, the friend I was with then followed them out. I then heard a gunshot and ran out of the room to find that my friend had been shot in his leg.
8. I noticed that after police and ambulance arrived on scene, an Indian man who was working at the Airway Motel came out of his office to observe what had occurred. However, I did not see him ask any questions or speak to Fulton County Police Department. He just looked around the area and did not speak to anyone.

9. It was well known, and I also personally observed, that there was lots of crime that occurred at the Airway Motel. Despite the crime, including the prostitution or sex trafficking, I never saw or heard of the motel employees telling any of the pimps or other criminals to leave the property or taking any other action to try to stop any of this.

10. I have read this Declaration consisting of 10 numbered paragraphs and I declare under penalty of perjury that it is true and correct.

Executed on November 2, 2022.



Shenika Wilcox